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January 10, 2022

VIA ECF

Hon. Loretta A. Preska
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

The proposed schedule is approved and SO ORDERED. The parties shall appear by telephone for a status conference on April 25, 2022 at 9:30 a.m. EDT using the following information.

Dial-in (USA): (877) 402-9753

Dial-in (International): (636) 651-3141

Access code: 6545179.

1/10/2022

Re: *Ideavillage Products Corp. v. 001xiaopuzi, et al.*
Civil Case No. 19-cv-9160
Proposed Discovery Schedule

Dear Judge Preska,

We represent Plaintiff Ideavillage Products Corp. (“Plaintiff” or “Ideavillage”) in the above-referenced action.¹ In accordance with the directives of the Court’s December 21, 2021 Order (Dkt. 62), together with Defendant Venus Rainbows, the parties have agreed on a proposed discovery schedule.

The parties have agreed to complete discovery as follows:

- The parties’ deadline to serve written discovery demands is **February 21, 2022**;
- The parties are to respond to the written discovery demands by **March 21, 2022**;
- Depositions are to be completed by **April 25, 2022**; and
- Expert discovery (if any) is to be completed by **May 25, 2022**.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Danielle S. Futterman

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Attorneys for Plaintiff

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary.